

Certified Mail No.:

Activity No.: PER20080001
Agency Interest No.: 156200

Mr. Troy E. Valenzuela
Vice President – Environmental, Health, & Safety
Plains Marketing, LP
PO Box 4648
Houston, Texas 77210-4648

RE: Permit, Plains Marketing LP - Delcambre Terminal, Plains Marketing, LP
Delcambre, Iberia and Vermilion Parishes, Louisiana

Dear Mr. Valenzuela:

This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 1260-00170-00

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

CSN:sbp

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Plains Marketing LP - Delcambre Terminal
Agency Interest No.: 156200
Plains Marketing, LP
Delcambre, Iberia and Vermilion Parishes, Louisiana

I. BACKGROUND

Plains Marketing LP - Delcambre Terminal is an existing, grandfathered crude oil storage and transportation terminal owned and operated by Plains Marketing, LP. This is the initial permit for the facility.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated February 19, 2008, were received requesting a permit.

III. DESCRIPTION

Crude oil is received by tank trucks, pipeline, and/or barge; and temporarily stored in a 55,000 bbl internal floating roof tank prior to being loaded out by barge. Emissions sources include the storage tank (TANK1), the marine loading dock (LOAD1), and fugitive sources (FUG1).

Plains Marketing, LP proposes to abide by federally enforceable limits, including the monitoring, recordkeeping, and reporting of Total VOC emissions generated from loading operations during any consecutive 12-month period in order to allow for maximum flexibility regarding the volume of crude oil of which can be loaded onto barges during any consecutive 12-month period while maintaining minor source status.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Change
VOC ¹	91.58

¹VOC speciation in tons per year:

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions
2,2,4-Trimethylpentane	0.119
Benzene	1.37
Ethylbenzene	0.097
n-Hexane	1.46
Toluene	0.685
Xylenes	0.287
Total TAP's	4.018

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
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**Plains Marketing LP - Delcambre Terminal
Agency Interest No.: 156200
Plains Marketing, LP
Delcambre, Iberia and Vermilion Parishes, Louisiana**

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD), and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).

V. PUBLIC NOTICE

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VI. EFFECTS ON AMBIENT AIR

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VII. GENERAL CONDITION XVII ACTIVITIES

There are no activities specified.

VIII. INSIGNIFICANT ACTIVITIES

There are no activities specified.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated February 19, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 156200 Plains Marketing LP - Delcambre Terminal

Activity Number: PER20080001

Permit Number: 1260-00170-00

Air - Minor (Synthetic) Initial

ISO Known As:	ID	Name	User Group	Start Date
	1260-00170	Plains Marketing LP - Delcambre Terminal	CDS Number	02-22-2008

Physical Location:

off County Dr
Delcambre, LA 70528

Mailing Address:

PO Box 4648
Houston, TX 772104648

Location of Front Gate:

29° 56' 0" 96 hundredths latitude, 91° 58' 51" 84 hundredths longitude, Coordinate Method: Interpolation - Digital Map Source (TIGER), Coordinate Datum: WGS84

Related People:

Name	Mailing Address	Phone (Type)	Relationship
Troy Valenzuela	PO Box 4648 Houston, TX 772104648	tevalenzuela@paalp	Responsible Official for
Troy Valenzuela	PO Box 4648 Houston, TX 772104648	7136464614 (WP)	Responsible Official for

Related Organizations:

Name	Address	Phone (Type)	Relationship
Plains Marketing LP	PO Box 4648 Houston, TX 772104648	7136464515 (WP)	Air Billing Party for
Plains Marketing LP	PO Box 4648 Houston, TX 772104648	7136464515 (WP)	Owms

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 156200 - Plains Marketing LP - Delcambre Terminal

Activity Number: PER20080001

Permit Number: 1260-00170-00

Air - Minor (Synthetic) Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Plains Marketing LP - Delcambre Terminal						
EQT0001	TANK1 - Storage Tank No. 9151	55000 bbl	3500 bbl/hr	4.75 MM bbl/yr	Crude Oil	8760 hr/yr (All Year)
EQT0002	LOAD1 - Barge Loading Dock					1937 hr/yr (All Year)
FUG0001	FUG1 - Fugitive Sources		Not applicable	Not applicable		8760 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
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Relationships:

Subject Item Groups:

ID	Group Type	Group Description
UNF0001	Unit or Facility Wide	Facility - Plains Marketing LP - Delcambre Terminal

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1650	Petroleum Bulk Terminal		

SIC Codes:

5171	Petroleum bulk stations and terminals	AI156200
5171	Petroleum bulk stations and terminals	UNF001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 156200 - Plains Marketing LP - Delcambre Terminal
 Activity Number: PER20080001
 Permit Number: 1260-00170-00
 Air - Minor (Synthetic) Initial

Subject Item	VOC		
	Avg lb/hr	Max lb/hr	Tons/Year
Plains Marketing LP - Delcambre Terminal			
EQT 0001 TANK1	0.41	1.96	1.78
EQT 0002 LOAD1	92.53	118.52	89.60
FUG 0001 FUG1	0.05	0.05	0.20

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

EQT 0002 VOC Tons/Year Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total VOC exceeds the maximum listed in this specific condition for any twelve consecutive month period Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 156200 - Plains Marketing LP - Delcambre Terminal

Activity Number: PER20080001

Permit Number: 1260-00170-00

Air - Minor (Synthetic) Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 TANK1	2,2,4-Trimethylpentane	< 0.001	0.002	0.002
	Benzene	0.003	0.012	0.015
	Ethyl benzene	0.001	0.006	0.004
	Toluene	0.003	0.006	0.014
	Xylene (mixed isomers)	0.003	0.021	0.015
	n-Hexane	0.003	0.009	0.014
EQT 0002 LOAD1	2,2,4-Trimethylpentane	0.121	0.162	0.117
	Benzene	1.40	1.868	1.35
	Ethyl benzene	0.096	0.134	0.093
	Toluene	0.69	0.943	0.669
	Xylene (mixed isomers)	0.28	0.392	0.272
	n-Hexane	1.49	1.97	1.44
FUG 0001 FUG1	2,2,4-Trimethylpentane	< 0.001	< 0.001	< 0.001
	Benzene	0.001	0.001	0.003
	Ethyl benzene	< 0.001	< 0.001	< 0.001
	Toluene	< 0.001	< 0.001	0.002
	Xylene (mixed isomers)	< 0.001	< 0.001	0.001
	n-Hexane	0.001	0.001	0.003
UNF 0001 Facility	2,2,4-Trimethylpentane			0.119
	Benzene			1.37
	Ethyl benzene			0.097
	Toluene			0.685
	Xylene (mixed isomers)			0.287
	n-Hexane			1.46

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS**AI ID: 156200 - Plains Marketing LP - Delcambre Terminal****Activity Number: PER20080001****Permit Number: 1260-00170-00****Air - Minor (Synthetic) Initial****EQT0001 TANK1 - Storage Tank No. 9151**

- 1 [40 CFR 60.112(a)(1)] Equip with a floating roof, a vapor recovery system, or their equivalents. Subpart K. [40 CFR 60.112(a)(1)]
- 2 [40 CFR 60.113] Petroleum liquid storage data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period, except as provided in 40 CFR 60.113(d). Subpart K.
- 3 [LAC 33:III.2103 B] Equip with a submerged fill pipe.
- 4 [LAC 33:III.2103 C.1 b] Equip internal floating roof with a mechanical shoe seal (metallic-type shoe seal) consisting of a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- 5 [LAC 33:III.2103 C] Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which will rest or float on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. All tank gauging and sampling devices will be gas-tight except when gauging or sampling is taking place.
- 6 [LAC 33:III.2103 H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 7 [LAC 33:III.2103 I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT0002 LOAD1 - Barge Loading Dock

- 8 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March. Report the total VOC emissions for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- 9 [LAC 33:III.501.C.6] VOC, Total monitored by calculations monthly.
- 10 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
VOC, Total recordkeeping by electronic or hard copy monthly. Keep records of the total VOC emissions each month, as well as the total VOC emissions for the last twelve months. Make records available for inspection by DEQ personnel.

FUG0001 FUG1 - Fugitive Sources

- 11 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

UNF0001 Plains Marketing LP - Delcambre Terminal

- 12 [LAC 33:III.2113 A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 13 [LAC 33:III.2119] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.

SPECIFIC REQUIREMENTS

AI ID: 156200 - Plains Marketing LP - Delcambre Terminal

Activity Number: PER20080001

Permit Number: 1260-00170-00

Air - Minor (Synthetic) Initial

UNF0001 Plains Marketing LP - Delcambre Terminal

14 [LAC 33:III.2901.D]

Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.

15 [LAC 33:III.2901.F]

If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.

16 [LAC 33:III.5611.A]

Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution

Emergency: Due within 30 days after requested by the administrative authority.

17 [LAC 33:III.5611.B]

During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.